

**Exhibit A – Amended Scheduling Order Proposal**

<b>Event</b>	<b>Defendants’ Proposed Date</b>	<b>Plaintiffs’ Proposed Date</b>
Plaintiffs to serve “Disclosure of Infringement Contentions” and “Responses to Invalidity Contentions,” and produce underlying documents pursuant to L. Pat. R. 3.6(g)-(i)	January 19, 2021 <b>T</b>	
Parties to exchange claim terms to be construed pursuant to L. Pat. R. 4.1(a)	January 29, 2021 <b>F</b>	
Parties to exchange “Preliminary Claim Constructions” and identification of supporting intrinsic and extrinsic evidence pursuant to L. Pat. R. 4.2(a)-(b)	February 19, 2021 <b>F</b>	
Parties to exchange identification of intrinsic and extrinsic evidence in support of opposition to other party’s proposed constructions pursuant to L. Pat. R. 4.2(b) and (c)	March 5, 2021 <b>F</b>	
Parties to file Joint Claim Construction and Prehearing Statement pursuant to L. Pat. R. 4.3	March 19, 2021 <b>F</b>	
Completion of fact discovery relating to claim construction, including depositions of non-expert witnesses identified in prior claim construction exchanges pursuant to L. Pat. R. 4.4	March 26, 2021 <b>F</b>	
Parties to file Opening <i>Markman</i> Briefs pursuant to L. Pat. R. 4.5(a)	April 16, 2021 <b>F</b>	
Completion of any discovery from an expert witness who submitted a certification or declaration pursuant to L. Pat. R. 4.5(b)	May 12, 2021 <b>W</b>	
Parties to file Responsive <i>Markman</i> Briefs pursuant to L. Pat. R. 4.5(c)	June 2, 2021 <b>W</b>	

<b>Event</b>	<b>Defendants' Proposed Date</b>	<b>Plaintiffs' Proposed Date</b>
Parties to submit Proposed Schedule for Claim Construction Hearing pursuant to L. Pat. R. 4.6	June 9, 2021 <b>W</b>	
Deadline for parties to seek leave to amend pleadings or join parties without leave of Court	June 10, 2021 <b>Th</b>	
Claim Construction Hearing	<i>Subject to the Court's availability</i>	
Any party, if relying upon advice of counsel as part of a patent-related claim or defense for any reason, to produce discovery related thereto for which the attorney-client and work product protection have been waived and to Serve a privilege log pursuant to L. Pat. R. 3.8.	<i>Not later than 30 days after entry of the Court's claim construction order</i>	
Date for substantial completion of document production	June 17, 2021 <b>Th</b>	
Parties to identify location(s) for depositions of foreign witnesses if any	June 17, 2021 <b>Th</b>	
Close of fact discovery	September 20, 2021 <b>M</b>	November 4, 2021 <b>Th</b>
Parties to exchange opening expert reports on issues for which a party bears the burden of proof	November 22, 2021 <b>M</b>	January 6, 2022 <b>Th</b>
Exchange rebuttal expert reports (including Plaintiffs' reports on any objective indicia of nonobviousness)	January 24, 2022 <b>M</b>	March 10, 2022 <b>Th</b>
Exchange reply expert reports (including Defendants' responsive reports to Plaintiffs' reports on any objective indicia of nonobviousness)	March 7, 2022 <b>M</b>	April 21, 2022 <b>Th</b>
Close of expert discovery	June 27, 2022 <b>M</b>	August 11, 2022 <b>Th</b>

<b>Event</b>	<b>Defendants' Proposed Date</b>	<b>Plaintiffs' Proposed Date</b>
Deadline for parties to file dispositive motions	August 22, 2022 <b>M</b>	October 6, 2022 <b>Th</b>
Deadline for parties to file responsive dispositive motions	September 19, 2022 <b>M</b>	November 3, 2022 <b>Th</b>
Deadline for parties to file reply dispositive motions	October 3, 2022 <b>M</b>	November 17, 2022 <b>Th</b>
Settlement Conference	<i>Subject to the Court's availability</i>	
Submission of Final Pretrial Order	November __, 2022 ( <i>Subject to the Court's availability</i> )	January __, 2023 ( <i>Subject to the Court's availability</i> )
Final Pretrial Conference	November __, 2022 ( <i>Subject to the Court's availability</i> )	January __, 2023 ( <i>Subject to the Court's availability</i> )
Trial	Early December __, 2022 ( <i>Subject to the Court's availability</i> )	February __, 2023 ( <i>Subject to the Court's availability</i> )
7.5 Year Stay Expires	June 21, 2023 <b>W</b>	

So Ordered: December 22, 2020

*Karen M. Williams*

Karen M. Williams  
United States Magistrate Judge